REMARKS

Claims 1 - 29 are pending in this Application. Reconsideration and further examination is respectfully requested.

Claim Rejections – 35 USC § 103

1. Claims 1, 3-4, 6, 8-11, 13-14, 16, 18-21, 23-26, and 28-29 were rejected under 35 U.S.C. 103(a) as being unpatentable over Mannam (2004/0105459). This rejection is respectfully traversed.

In accordance with the Applicants' invention as set forth in exemplary claim 1, there is provided a network element comprising a plurality of mappers for mapping packet traffic to electrical streams. The network element further includes a packet switch forwarding a first portion of packet traffic to a first one of the mappers and a second portion of the packet traffic to a second one of the mappers, the first one of the mappers mapping the first portion of the packet traffic into a first electrical stream targeted to a first destination on an optical transport network and the second one of the mappers mapping the second portion of the packet traffic into a second electrical stream targeted to a second destination on the optical transport network.

To establish a prima facie case of obviousness, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The Office Action asserts as to claims 1, 11, and 20 that Mannam shows the Applicants' claimed plurality of mappers. The Applicants disagree.

In the Applicant's claimed invention, the claimed network interface includes a packet switch. The switch forwards packet traffic to the mappers. The mappers map the packet traffic

to electrical streams targeted to an optical network – e.g., the mappers can receive packets, and then produce GFP mapped STS streams.

Mannam, in contrast, switches GFP signals. The Office Action refers to "mappers in line cards" but the line cards are receiving STS streams. The Office Action refers to mappers "mapping packet traffic into electrical stream (paragraph [0038] – [0042], [0118]). But the Applicants note that the switch of Mannam switches GFP frames. See paragraph [0013] of Mannam. Since frames are switched at the GFP level, there are no multiple mappers in Mannam mapping packet traffic to electrical streams.

Mannam, therefore, fails to teach or suggest the Applicants' claimed invention as set forth in Claim 1 comprising a plurality of mappers mapping packet traffic to electrical streams. Independent Claims 11 and 20 contain limitations similar to those of Claim 1. The Applicants therefore respectfully assert that Claims 1, 3-4, 6, 8-11, 13-14, 16, 18-21, 23-26, and 28-29 are in condition for allowance.

2. Claims 2, 5, 7, 12, 15, `7, 22, and 27 are rejected under 35 U.S.C. 103(a) as being unpatentable over Mannam (2004/0105459) in view of Dravida et al. US patent (7, 072, 360). This rejection is respectfully traversed. Mannam and Dravida, taken either alone or in combination, still fail to teach or suggest the applicants' claimed plurality of mappers mapping packet traffic to electrical streams, as required by the independent claims from which these claims depend. The Applicants therefore respectfully assert that claims 2, 5, 7, 12, 15, `7, 22, and 27 are in condition for allowance.

CONCLUSION

In view of the arguments made herein, Applicants submit that the application is in condition for allowance and request early favorable action by the Examiner.

If the Examiner believes that a telephone conversation with the Applicants' representative would expedite allowance of this application, the Examiner is cordially invited to call the undersigned at (508) 303-2003.

Respectfully submitted,

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Reg. No.: 37,946

/Mary M. Steubing/
Mary M. Steubing
Attorney for Applicants
Guerin & Rodriguez, LLP
5 Mount Royal Avenue
Marlborough, MA 01752

Fax No.: (508) 303-0005
Tel. No.: (508) 303-2003